# State of Utah

# DEPARTMENT OF ENVIRONMENTAL QUALITY DIVISION OF AIR QUALITY

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## **Title V Operating Permit**

**PERMIT NUMBER: 300030001** 

DATE OF PERMIT: February 12, 2001

Date of Last Revision: May 3, 2002

This Operating Permit is issued to, and applies to the following:

Name of Permittee:	Permitted Location:

Vulcraft, Division of Nucor Corporation 1875 West Highway 13 South PO Box 637 Brigham City, UT 84302-0637 Steel Products Manufacturing 1875 West Hwy 13 South Brigham City, UT 84302

UTM coordinates: 4,598,000 meters Northing, 411,500 meters Easting

SIC code: 3449

## **ABSTRACT**

Vulcraft operates a steel fabrication plant in Box Elder county, near Brigham City. Processes involve the manufacture of steel grinding balls, bars, coils, wire lines, structural joists, and trusses. Vulcraft is a Title V major source as well as a prevention of significant deterioration (PSD) major source for VOC.

UTAH AIR QUALITY BOARD	
By:	Prepared By:
Dishard W. Sprott Evroptive Constant	Dohart Crondy
Richard W. Sprott, Executive Secretary	Robert Grandy

## **Operating Permit History**

2/12/2001 - Permit issued	Action initiated by an initial operating permit application	Enter project description here.
5/3/2002 -Permit modified	Action initiated by an administrative amendment (initiated by DAQ)	To incorporate Enhanced AO changes. The changes included replacement of an existing baghouse with two new ones, and permitting limited spray painting operations.

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Issued under authority of Utah Code Ann. Section 19-2-104 and 19-2-109.1, and in accordance with Utah Administrative Code R307-415 Operating Permit Requirements.

All definitions, terms and abbreviations used in this permit conform to those used in Utah Administrative Code R307-101 and R307-415 (Rules), and 40 Code of Federal Regulations (CFR), except as otherwise defined in this permit. Unless noted otherwise, references cited in the permit conditions refer to the Rules.

Where a permit condition in Section I, General Provisions, partially recites or summarizes an applicable rule, the full text of the applicable portion of the rule shall govern interpretations of the requirements of the rule. In the case of a conflict between the Rules and the permit terms and conditions of Section II, Special Provisions, the permit terms and conditions of Section II shall govern except as noted in Provision I.M, Permit Shield.

## **Section I: General Provisions**

#### I.A. Federal Enforcement.

All terms and conditions in this permit, including those provisions designed to limit the potential to emit, are enforceable by the EPA and citizens under the Clean Air Act of 1990 (CAA) except those terms and conditions that are specifically designated as "State Requirements". (R307-415-6b)

## I.B. Permitted Activity(ies).

Except as provided in R307-415-7b(1), the permittee may not operate except in compliance with this permit. (See also Provision I.E, Application Shield)

## I.C. **Duty to Comply.**

- I.C.1 The permittee must comply with all conditions of the operating permit. Any permit noncompliance constitutes a violation of the Air Conservation Act and is grounds for any of the following: enforcement action; permit termination; revocation and reissuance; modification; or denial of a permit renewal application. (R307-415-6a(6)(a))
- I.C.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (R307-415-6a(6)(b))
- I.C.3 The permittee shall furnish to the Executive Secretary, within a reasonable time, any information that the Executive Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Executive Secretary copies of records required to be kept by this permit or, for information claimed to be confidential, the permittee may furnish such records directly to the EPA along with a claim of confidentiality. (R307-415-6a(6)(e))
- I.C.4 This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance shall not stay

any permit condition, except as provided under R307-415-7f(1) for minor permit modifications. (R307-415-6a(6)(c))

## I.D. Permit Expiration and Renewal.

- I.D.1 This permit is issued for a fixed term of five years and expires on February 12, 2006. (R307-415-6a(2))
- I.D.2 Application for renewal of this permit is due by August 12, 2005. An application may be submitted early for any reason. (R307-415-5a(1)(c))
- I.D.3 An application for renewal submitted after the due date listed in I.D.2 above shall be accepted for processing, but shall not be considered a timely application and shall not relieve the permittee of any enforcement actions resulting from submitting a late application. (R307-415-5a(5))
- I.D.4 Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted consistent with R307-415-7b (see also Provision I.E, Application Shield) and R307-415-5a(1)(c) (see also Provision I.D.2). (R307-415-7c(2))

## I.E. Application Shield.

If the permittee submits a timely and complete application for renewal, the permittee's failure to have an operating permit will not be a violation of R307-415, until the Executive Secretary takes final action on the permit renewal application. In such case, the terms and conditions of this permit shall remain in force until permit renewal or denial. This protection shall cease to apply if, subsequent to the completeness determination required pursuant to R307-415-7a(3), and as required by R307-415-5a(2), the applicant fails to submit by the deadline specified in writing by the Executive Secretary any additional information identified as being needed to process the application. (R307-415-7b(2))

## I.F. Severability.

In the event of a challenge to any portion of this permit, or if any portion of this permit is held invalid, the remaining permit conditions remain valid and in force. (R307-415-6a(5))

## I.G. **Permit Fee.**

- I.G.1 The permittee shall pay an annual emission fee to the Executive Secretary consistent with R307-415-9. (R307-415-6a(7))
- I.G.2 The emission fee shall be due on October 1 of each calendar year or 45 days after the source receives notice of the amount of the fee, whichever is later. (R307-415-9(4)(a))

#### I.H. No Property Rights.

This permit does not convey any property rights of any sort, or any exclusive privilege. (R307-415-6a(6)(d))

## I.I. Revision Exception.

No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (R307-415-6a(8))

## I.J. Inspection and Entry.

- I.J.1 Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Executive Secretary or an authorized representative to perform any of the following:
- I.J.1.a Enter upon the permittee's premises where the source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit. (R307-415-6c(2)(a))
- I.J.1.b Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit. (R307-415-6c(2)(b))
- I.J.1.c Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practice, or operation regulated or required under this permit. (R307-415-6c(2)(c))
- I.J.1.d Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements. (R307-415-6c(2)(d))
- I.J.2 Any claims of confidentiality made on the information obtained during an inspection shall be made pursuant to Utah Code Ann. Section 19-1-306. (R307-415-6c(2)(e))

#### I.K. Certification.

Any application form, report, or compliance certification submitted pursuant to this permit shall contain certification as to its truth, accuracy, and completeness, by a responsible official as defined in R307-415-3. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R307-415-5d)

## I.L. Compliance Certification.

- I.L.1 Permittee shall submit to the Executive Secretary an annual compliance certification, certifying compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall be submitted no later than February 1, 2002 and that date each year following until this permit expires. The certification shall include all the following (permittee may cross-reference this permit or previous reports): (R307-415-6c(5))
- I.L.1.a The identification of each term or condition of this permit that is the basis of the certification:
- I.L.1.b The identification of the methods or other means used by the permittee for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such

methods and other means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements in this permit. If necessary, the permittee also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information;

- I.L.1.c The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Provision I.L.1.b. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
- I.L.1.d Such other facts as the Executive Secretary may require to determine the compliance status.
- I.L.2 The permittee shall also submit all compliance certifications to the EPA, Region VIII, at the following address or to such other address as may be required by the Executive Secretary: (R307-415-6c(5)(d))

Office of Enforcement, Compliance and Environmental Justice (mail code 8ENF)
EPA, Region VIII
999 18th Street, Suite 300
Denver, CO 80202-2466

## I.M. **Permit Shield.**

- I.M.1 Compliance with the provisions of this permit shall be deemed compliance with any applicable requirements as of the date of this permit, provided that:
- I.M.1.a Such applicable requirements are included and are specifically identified in this permit, or (R307-415-6f(1)(a))
- I.M.1.b Those requirements not applicable to the source are specifically identified and listed in this permit. (R307-415-6f(1)(b))
- I.M.2 Nothing in this permit shall alter or affect any of the following:
- I.M.2.a The emergency provisions of Utah Code Ann. Section 19-1-202 and Section 19-2-112, and the provisions of the CAA Section 303. (R307-415-6f(3)(a))
- I.M.2.b The liability of the owner or operator of the source for any violation of applicable requirements under Utah Code Ann. Section 19-2-107(2)(g) and Section 19-2-110 prior to or at the time of issuance of this permit. (R307-415-6f(3)(b)
- I.M.2.c The applicable requirements of the Acid Rain Program, consistent with the CAA Section 408(a). (R307-415-6f(3)(c))

I.M.2.d The ability of the Executive Secretary to obtain information from the source under Utah Code Ann. Section 19-2-120, and the ability of the EPA to obtain information from the source under the CAA Section 114. (R307-415-6f(3)(d))

## I.N. Emergency Provision.

- I.N.1 An "emergency" is any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. (R307-415-6g(1))
- I.N.2 An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the affirmative defense is demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- I.N.2.a An emergency occurred and the permittee can identify the causes of the emergency. (R307-415-6g(3)(a))
- I.N.2.b The permitted facility was at the time being properly operated. (R307-415-6g(3)(b))
- I.N.2.c During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in this permit. (R307-415-6g(3)(c))
- I.N.2.d The permittee submitted notice of the emergency to the Executive Secretary within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. This notice fulfills the requirement of Provision I.S.2.c below. (R307-415-6g(3)(d))
- I.N.3 In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. (R307-415-6g(4))
- I.N.4 This emergency provision is in addition to any emergency or upset provision contained in any other section of this permit. (R307-415-6g(5))

## I.O. **Operational Flexibility.**

Operational flexibility is governed by R307-415-7d(1).

## I.P. Off-permit Changes.

Off-permit changes are governed by R307-415-7d(2).

## I.Q. Administrative Permit Amendments.

Administrative permit amendments are governed by R307-415-7e.

## I.R. **Permit Modifications.**

Permit modifications are governed by R307-415-7f.

## I.S. Records and Reporting.

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	S	1	Records
	. 7		RECORDS

- I.S.1.a The records of all required monitoring data and support information shall be retained by the permittee for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-charts or appropriate recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. (R307-415-6a(3)(b)(ii)
- I.S.1.b For all monitoring requirements described in Section II, Special Provisions, the source shall record the following information, where applicable: (R307-415-6a(3)(b)(i))
- I.S.1.b.1 The date, place as defined in this permit, and time of sampling or measurement.
- I.S.1.b.2 The date analyses were performed.
- I.S.1.b.3 The company or entity that performed the analyses.
- I.S.1.b.4 The analytical techniques or methods used.
- I.S.1.b.5 The results of such analyses.
- I.S.1.b.6 The operating conditions as existing at the time of sampling or measurement.
- I.S.1.c Additional record keeping requirements, if any, are described in Section II, Special Provisions.

## I.S.2 Reports.

- I.S.2.a Monitoring reports shall be submitted to the Executive Secretary every six months, or more frequently if specified in Section II. All instances of deviation from permit requirements shall be clearly identified in the reports. (R307-415-6a(3)(c)(i))
- I.S.2.b All reports submitted pursuant to Provision I.S.2.a shall be certified by a responsible official in accordance with Provision I.K of this permit. (R307-415-6a(3)(c)(i)
- I.S.2.c The Executive Secretary shall be notified promptly of any deviations from permit requirements including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventative measures taken. **Prompt, as used in this condition, shall be defined as written notification within 14 days**. Deviations from permit requirements due to unavoidable breakdowns shall be reported in accordance with the provisions of R307-107. (R307-415-6a(3)(c)(ii))

- I.S.3 Notification Addresses.
- I.S.3.a All reports, notifications, or other submissions required by this permit to be submitted to the Executive Secretary are to be sent to the following address or to such other address as may be required by the Executive Secretary:

Utah Division of Air Quality P.O. Box 144820 Salt Lake City, UT 84114-4820

Phone: 801-536-4000

I.S.3.b All reports, notifications or other submissions required by this permit to be submitted to the EPA should be sent to one of the following addresses or to such other address as may be required by the Executive Secretary:

## For annual compliance certifications

Environmental Protection Agency, Region VIII Office of Enforcement, Compliance and Environmental Justice (mail code 8ENF) 999 18th Street, Suite 300 Denver, CO 80202-2466

For reports, notifications, or other correspondence related to permit modifications, applications, etc. Environmental Protection Agency, Region VIII Office of Partnerships & Regulatory Assistance Air & Radiation Program (mail code 8P-AR) 999 18th Street, Suite 300 Denver, CO 80202-2466

Phone: 303-312-6440

## I.T. Reopening for Cause.

- I.T.1 A permit shall be reopened and revised under any of the following circumstances:
- I.T.1.a New applicable requirements become applicable to the permittee and there is a remaining permit term of three or more years. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the terms and conditions of this permit have been extended pursuant to R307-415-7c(3), application shield. (R307-415-7g(1)(a))
- I.T.1.b The Executive Secretary or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit. (R307-415-7g(1)(c))
- I.T.1.c EPA or the Executive Secretary determines that this permit must be revised or revoked to assure compliance with applicable requirements. (R307-415-7g(1)(d))
- I.T.1.d Additional applicable requirements are to become effective before the renewal date of this permit and are in conflict with existing permit conditions. (R307-415-7g(1)(e))

- I.T.2 Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. (R307-415-7g(2))
- I.U. Inventory Requirements.
- I.U.1 An emission inventory shall be submitted in accordance with the procedures of R307-150, Emission Inventories. (R307-150)
- I.U.2 A Hazardous Air Pollutant Inventory shall be submitted in accordance with the procedures of R307-155, Hazardous Air Pollutant Inventory. (R307-155)

## **Section II: SPECIAL PROVISIONS**

## II.A. Emission Unit(s) Permitted to Discharge Air Contaminants.

(R307-415-4(3)(a) and R307-415-4(4))

## II.A.1 Wire Line Baghouse-Cold Finish Area (designated as 1)

Unit Description: Dust collector, approximately 2,112 scfm.

II.A.2 **Coil Line Baghouse** (designated as 2)

Unit Description: Baghouse controlling emissions from the Coil Line. Approximate capacity is 5,500 dscf. Located in the Cold-Finish area.

II.A.3 **Bar Line Bag House** (designated as 2b)

Unit Description: Baghouse controlling emissions from the Bar line. Approximate capacity is 14,266 dscf. Located in the Cold-Finish area.

II.A.4 Exhaust Vents - Cold Finish Area (designated as 3)

Unit Description: Miscellaneous powered and non-powered exhaust vents. No unitspecific applicable requirements.

II.A.5 **Parts Cleaners - Cold Finish Area** (designated as 4)

Unit Description: Miscellaneous parts cleaners with lids. No unit-specific applicable requirements.

II.A.6 Rotary Hearth Furnaces- Ball Mill (designated as 5)

Unit Description: Two natural gas fired rotary hearth furnaces that use propane for backup. Approximately 12.8 MM BTU/hour each.

II.A.7 **Exhaust Vents - Ball Mill** (designated as 6)

Unit Description: Miscellaneous powered and non-powered exhaust vents. No unitspecific applicable requirements.

II.A.8 **Parts Cleaners - Ball Mill** (designated as 7)

Unit Description: Miscellaneous parts cleaners with lids. No unit-specific applicable requirements.

II.A.9 **Joist and Truss Painting Equipment** (designated as 8)

Unit Description: Joist and truss painting equipment includes ten dip tanks with covers that can be closed when not in use, and spray equipment for custom color painting.

II.A.10 **Bridging Line System- Joist Plant** (designated as 9)

Unit Description: Coating process including an oven. Rated capacity approximately 2.4 MM BTU/hour. Uses natural gas with propane as backup.

II.A.11 **Exhaust Vents - Joist Plant** (designated as 10)

Unit Description: Miscellaneous powered and non-powered exhaust vents. No unitspecific applicable requirements.

II.A.12 **Parts Cleaners - Joist Plant** (designated as 11)

Unit Description: Miscellaneous parts cleaners with lids. No unit-specific applicable requirements.

II.A.13 **Mixed Gas System Emergency Fuel Supply** (designated as 12)

Unit Description: Used for mixing propane with air to make it suitable for burning during natural gas outages. No unit-specific applicable requirements.

II.A.14 Exhaust Vents - Compressor Building (designated as 13)

Unit Description: Miscellaneous powered and non-powered exhaust vents No unitspecific applicable requirements.

II.A.15 **Exhaust Vents - Truck Shop** (designated as 14)

Unit Description: Miscellaneous powered and non-powered exhaust vents No unitspecific applicable requirements.

## II.A.16 Parts Cleaners - Truck Shop (designated as 15)

Unit Description: Miscellaneous parts cleaners with lids. No unit-specific applicable requirements.

## **II.B.** Requirements and limitations.

The following emission limitations, standards, and operational limitations apply to the permitted facility as indicated: (R307-415-6a(1))

#### II.B.1 Conditions on permitted source (Source-wide)

#### II.B.1.a **Condition:**

All unpaved roads and other unpaved operational areas that are used by mobile equipment shall be water sprayed and/or chemically treated to control fugitive dust. Treatment shall be of sufficient frequency and quantity to minimize fugitive dust as necessary to meet a 20 percent opacity limitation. The permittee is not required to apply water to surfaces during freezing conditions. If chemical treatment is to be used, the plan shall be pre-approved by the Executive Secretary. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-269-02]

## II.B.1.a.1 **Monitoring:**

In lieu of monitoring the above opacity limit via visible emissions observations, application of water and chemical treatments shall be monitored to demonstrate that fugitive dust is being controlled and minimized.

## II.B.1.a.2 **Recordkeeping:**

Instances of water and/or chemical application to unpaved areas shall be recorded and maintained by the permittee. The records shall include the following:

- (1) Date
- (2) Number of treatments made, dilution ratio, and quantity.
- (3) Rainfall received, if any, and approximate amount.
- (4) Time of day that treatments are made.
- (5) Records of temperature if the temperature is below freezing.

## II.B.1.a.3 **Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

#### II.B.1.b Condition:

The permittee shall comply with the applicable requirements for recycling and emission reduction for class I and class II refrigerants pursuant to 40 CFR 82, Subpart F - Recycling and Emissions Reduction. [Authority granted under 40 CFR 82.150(b); condition originated in 40 CFR 82]

## II.B.1.b.1 **Monitoring:**

The permittee shall certify, in the annual compliance statement required in Section I of this permit, its compliance status with the requirements of 40 CFR 82, Subpart F.

## II.B.1.b.2 **Recordkeeping:**

All records required in 40 CFR 82, Subpart F shall be maintained consistent with the requirements of Provision S.1 in Section I of this permit.

## II.B.1.b.3 **Reporting:**

All reports required in 40 CFR 82, Subpart F shall be submitted as required. There are no additional reporting requirements except as outlined in Section I of this permit.

## II.B.2 Conditions on Wire Line Baghouse-Cold Finish Area (1)

## II.B.2.a **Condition:**

Visible emissions shall be no greater than 5 percent opacity. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-269-02]

## II.B.2.a.1 **Monitoring:**

A visual observation shall be performed at least once during each week that the baghouse operates. Visual observations shall be made by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9. The individual is not required to be a certified visible emissions observer (VEO). If any visible emissions are observed, an opacity determination shall be performed by a certified VEO in accordance with 40 CFR 60, Appendix A, Method 9. The opacity determination shall be made within 24 hours, or at the beginning of the next day of baghouse operation, whichever period is longer.

In addition, the baghouse shall be monitored at least once during each week that it operates to demonstrate that pressure drop is within 2 to 6 inches of water column. The pressure gage shall be located such that an inspector/operator can safely read the indicator at any time. The reading shall be accurate to within plus or minus 2% of the full gage scale. The instrument shall be calibrated against a primary standard annually.

## II.B.2.a.2 **Recordkeeping:**

Results of monitoring shall be maintained as described in 40 CFR 60, Appendix A, Method 9, and Provision I.S.1 of this permit.

#### II.B.2.a.3 **Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

#### II.B.2.b Condition:

The above referenced baghouse shall be properly maintained. Maintenance shall include, but shall not be limited to, replacement of bags having holes or rips, and repair of pressure gages that are broken. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-269-02]

## II.B.2.b.1 **Monitoring:**

Inspections shall be conducted on a quarterly basis to verify adequate maintenance.

## II.B.2.b.2 **Recordkeeping:**

Records of inspections and maintenance shall be kept including at a minimum: baghouse identification, date of inspection, results of inspection, cartridge filter or bag replacements, pressure gage repairs, and other corrective actions taken.

## II.B.2.b.3 **Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

## II.B.3 <u>Conditions on Coil Line Baghouse (2)</u>

#### II.B.3.a **Condition:**

Visible emissions shall be no greater than 5 percent opacity. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-269-02]

## II.B.3.a.1 **Monitoring:**

A visual observation shall be performed at least once during each week that the baghouse operates. Visual observations shall be made by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9. The individual is not required to be a certified visible emissions observer (VEO). If any visible emissions are observed, an opacity determination shall be performed by a certified VEO in accordance with 40 CFR 60, Appendix A, Method 9. The opacity determination shall be made within 24 hours, or at the beginning of the next day of baghouse operation, whichever period is longer.

In addition, the baghouse shall be monitored at least once during each week that it operates to demonstrate that pressure drop is within 2 to 9 inches of water column. The pressure gage shall be located such that an inspector/operator can safely read the indicator at any time. The reading shall be accurate to within plus or minus 2% of the full gage scale. The instrument shall be calibrated against a primary standard annually.

## II.B.3.a.2 **Recordkeeping:**

Results of monitoring shall be maintained as described in 40 CFR 60, Appendix A, Method 9, and Provision I.S.1 of this permit.

#### II.B.3.a.3 **Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

#### II.B.3.b **Condition:**

The above referenced baghouse shall be properly maintained. Maintenance shall include, but shall not be limited to, replacement of bags having holes or rips, and repair of pressure gages that are broken. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-269-02]

## II.B.3.b.1 **Monitoring:**

Inspections shall be conducted on a quarterly basis to verify adequate maintenance.

## II.B.3.b.2 **Recordkeeping:**

Records of inspections and maintenance shall be kept including at a minimum: baghouse identification, date of inspection, results of inspection, cartridge filter or bag replacements, pressure gage repairs, and other corrective actions taken.

## II.B.3.b.3 **Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

## II.B.4 Conditions on Bar Line Bag House (2b)

#### II.B.4.a **Condition:**

The above referenced baghouse shall be properly maintained. Maintenance shall include, but shall not be limited to, replacement of bags having holes or rips, and repair of pressure gages that are broken. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-269-02]

## II.B.4.a.1 **Monitoring:**

Inspections shall be conducted on a quarterly basis to verify adequate maintenance.

## II.B.4.a.2 **Recordkeeping:**

Records of inspections and maintenance shall be kept including at a minimum: baghouse identification, date of inspection, results of inspection, cartridge filter or bag replacements, pressure gage repairs, and other corrective actions taken.

## II.B.4.a.3 **Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

## II.B.4.b **Condition:**

Visible emissions shall be no greater than 5 percent opacity. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-269-02]

## II.B.4.b.1 **Monitoring:**

A visual observation shall be performed at least once during each week that the baghouse operates. Visual observations shall be made by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9. The individual is not required to be a certified visible emissions observer (VEO). If any visible emissions are observed, an opacity determination shall be performed by a certified VEO in accordance with 40 CFR 60, Appendix A, Method 9. The opacity determination shall be made within 24 hours, or at the beginning of the next day of baghouse operation, whichever period is longer.

In addition, the baghouse shall be monitored at least once during each week that it operates to demonstrate that pressure drop is within 2 to 9 inches of water column. The pressure gage shall be located such that an inspector/operator can safely read the indicator at any time. The reading shall be accurate to within plus or minus 2% of the full gage scale. The instrument shall be calibrated against a primary standard annually.

## II.B.4.b.2 **Recordkeeping:**

Results of monitoring shall be maintained as described in 40 CFR 60, Appendix A, Method 9, and Provision I.S.1 of this permit.

## II.B.4.b.3 **Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

## II.B.5 Conditions on Rotary Hearth Furnaces- Ball Mill (5)

#### II.B.5.a **Condition:**

Visible emission shall be no greater than 5 percent opacity. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-269-02]

## II.B.5.a.1 **Monitoring:**

In lieu of monitoring via visible emission observations, the type of fuel used shall be monitored to demonstrate that only natural gas or propane is being combusted.

## II.B.5.a.2 **Recordkeeping:**

The permittee shall maintain records of the types of fuel combusted.

## II.B.5.a.3 **Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

## II.B.6 Conditions on Joist and Truss Painting Equipment (8)

## II.B.6.a **Condition:**

Emissions of VOC from the dipping and spraying of trusts and joists shall be no greater than 443.72 tons per rolling 12-month period. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-269-02]

#### II.B.6.a.1 **Monitoring:**

Emissions shall be calculated on a rolling 12-month total. Based on the first day of each month, a new 12-month total shall be calculated using data from the previous twelve months. Monthly calculations shall be made no later than 14 days after the end of each calendar month.

#### II.B.6.a.2 **Recordkeeping:**

VOC emissions shall be determined by maintaining a record of VOC emitting materials used each month. The records shall include the following data for each material used:

- 1. Name VOC emitting paint, solvent, thinner.
- 2. Density of each material used (pounds per gallon).
- 3. Percent by weight of VOC in each material used.
- 4. Amount of VOC emitting material used each month based on quantities pumped from bulk storage.

5. The amount of VOC emitted monthly by each material used, calculated by the following procedure:

$$VOC = (\% \ VOC \ by \ Weight) \ x \ (\underline{Density \ lb}) \ x \ (gal \ Consumed) \ x \ (\underline{1 \ ton})$$

$$(100) \qquad (gal) \qquad (2,000 \ lb)$$

6. The total amount of VOC emitted monthly from all materials used.

## II.B.6.a.3 **Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

#### II.B.6.b **Condition:**

The dip tanks shall be covered when not in use. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-269-02]

## II.B.6.b.1 **Monitoring:**

Records required for this permit condition will serve as monitoring.

## II.B.6.b.2 **Recordkeeping:**

Records of joist assembly/painting shall be maintained. Records shall include dates and times when joist assembly/painting commences and ends, and verification that the dip tank covers are in a closed position when joist assembly/painting has ceased and the dip tanks are not in use for 1-hour.

## II.B.6.b.3 **Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

## II.B.7 Conditions on Bridging Line System- Joist Plant (9)

## II.B.7.a **Condition:**

Visible emission shall be no greater than 20 percent opacity. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-269-02]

#### II.B.7.a.1 **Monitoring:**

In lieu of monitoring via visible emission observations, the type of fuel used shall be monitored to demonstrate that only natural gas or propane is being combusted.

#### II.B.7.a.2 **Recordkeeping:**

The permittee shall maintain records of the types of fuel combusted.

#### II.B.7.a.3 **Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

## II.C. Emissions Trading.

(R307-415-6a(10))

Not applicable to this source.

## **II.D.** Alternative Operating Scenarios.

(R307-415-6a(9))

Not applicable to this source.

## **Section III: PERMIT SHIELD**

A permit shield was not granted for any specific requirements.

## **Section IV: ACID RAIN PROVISIONS.**

This source is not subject to Title IV. This section is not applicable.

## REVIEWER COMMENTS

This operating permit incorporates all applicable requirements contained in the following documents:

DAQE-269-02

dated April 10, 2002

# 1. Comment on an item originating in DAQE-269-02 regarding permitted source (Sourcewide)

AO conditions 17, and 18 not carried into Title V permit.: AO condition 17 identifies requirement R307-150, Inventories, Testing, and Monitoring. This requirement is also identified in Section I.U.1 of this Operating Permit.

AO condition 18 identifies requirement R307-107, Unavoidable Breakdown Requirements. This requirement is also identified in Section I.S.2.c of this Operating Permit. [Comment last updated on 5/02/2002]

# 2. Comment on an item originating in DAQE-269-02 regarding Parts Cleaners -Joist Plant (Unit 11)

Solvent Usage: Virgin mineral spirit solvent (petroleum naphtha) is used in this parts cleaner. This solvent is non-halogenated and contains no HAPs. [Comment last updated on 5/02/2002]

## 3. Comment on an item originating in DAQE-269-02 regarding Parts Cleaners - Truck Shop (Unit 15)

Solvent Usage: Virgin mineral spirit solvent (petroleum naphtha) is used in this parts cleaner. This solvent is non-halogenated and contains no HAPs. [Comment last updated on 5/02/2002]

# 4. Comment on an item originating in DAQE-269-02 regarding Parts Cleaners - Cold Finish Area (Unit 4)

Solvent Usage: Virgin mineral spirit solvent (petroleum naphtha) is used in this parts cleaner. This solvent is non-halogenated and contains no HAPs. [Comment last updated on 5/02/2002]

# 5. Comment on an item originating in DAQE-269-02 regarding Parts Cleaners - Ball Mill (Unit 7)

Solvent Usage: Virgin mineral spirit solvent (petroleum naphtha) is used in this parts cleaner. This solvent is non-halogenated and contains no HAPs. [Comment last updated on 5/02/2002]

# 6. Comment on an item originating in Consent Decree regarding permitted source (Source-wide)

Pending Consent Decree Between USEPA and Nucor/Vulcraft: There is a pending consent decree between USEPA and Nucor/Vulcraft. This permit will be reopened to

implement any new applicable requirements that may result from that agreement. [Comment last updated on 4/13/2001]

# 7. Comment on an item originating in DAQE-269-02 regarding permitted source (Sourcewide)

AO condition 13: This condition limits the sulfur content of any fuel oil burned to 0.5% by weight. Since none of the stationary equipment in this permit utilizes that type of fuel, AO condition 13 will not be carried forth into the Title V permit. [Comment last updated on 5/02/2002]